

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ET AL.,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC. and
JETBLUE AIRWAYS CORPORATION,

Defendants.

Civil Action No. 1:21-cv-11558-LTS

**AMERICAN AIRLINES GROUP INC. AND JETBLUE AIRWAYS CORPORATION'S
MOTION FOR LEAVE TO FILE RESPONSE TO PLAINTIFFS' MOTION FOR
ENTRY OF FINAL JUDGMENT AND PERMANENT INJUNCTION**

Pursuant to Local Rule 7.1(b)(3), Defendants American Airlines Group Inc. and JetBlue Airways Corporation (“Defendants”) respectfully move for leave to file a response brief to address Plaintiffs’ Proposed Final Judgment and accompanying motion, Dkt. 353, and Plaintiffs’ Response to Defendants’ Motion for Entry of Final Judgment and Permanent Injunction, Dkt. 358. As the Court’s recent order recognizes, there are “meaningful disputes” between the parties “regarding the terms of the permanent injunction.” Dkt. 355. The proposed response brief is intended to assist the Court in resolving those disputes. In addition, given the fast-moving briefing schedule and Plaintiffs’ latest revisions to their form of Final Judgment, Defendants seek to ensure that the Court is fully informed about issues raised by Plaintiffs’ Revised Proposed Final Judgment, including certain technological limitations that make it impossible to comply with certain provisions. Defendants met and conferred with Plaintiffs regarding this motion for leave to file, and Plaintiffs indicated they oppose. Defendants did not oppose Plaintiffs’ supplemental filing,

Dkt. 358, and the Court should not allow Plaintiffs to file two briefs while Defendants are limited to one. Accordingly, the Court should grant this motion.

Defendants' proposed response brief is attached hereto as Exhibit A, and two declarations in support of that brief are attached hereto as Exhibits B and C.

Dated: June 14, 2023

Respectfully submitted,

/s/ Alfred C. Pfeiffer

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LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), undersigned counsel hereby certifies that counsel for Defendants has conferred with counsel for Plaintiffs regarding the relief requested in this motion, and Plaintiffs indicated they oppose this motion.

/s/ Alfred C. Pfeiffer
Alfred C. Pfeiffer

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing.

/s/ Alfred C. Pfeiffer
Alfred C. Pfeiffer